

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

AAS/RMP F. #2021R00600

271 Cadman Plaza East Brooklyn, New York 11201

November 04, 2024

Kenneth Abell Jarrod L. Schaeffer Abell Eskew Landau LLP 256 Fifth Avenue, 5th Floor New York, NY 10001

Seth DuCharme Nicole Boeckmann Bracewell LLP 31 W. 52nd Street, Suite 1900 New York, NY, 10019-6118

## By Email and ECF

Re: United States v. Sun, et. al.

Criminal Docket No. 24-CR-346 (BMC)

## Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_011599- EDNY_011611	Photographs from the Search of the Bank of America Safe Deposit Box

Bates No.	Description of Item
EDNY_011612- EDNY_011616	Photographs from the Search of the Citibank Safe Deposit Box
EDNY_011617-EDNY_011617	Evidence Collected Item Log from the Search of the TD Bank Safe Deposit Box
EDNY_011618-EDNY_011618	Evidence Collected Item Log from the Search of the Entity Identified in the Indictment as the Liquor Store
EDNY_011619-EDNY_011621	Evidence Collected Item Log from the Search of the Residence of the Person Identified in the Indictment as the Relative
EDNY_011622- EDNY_011922	Photographs from the Search of the Residence of the Person Identified in the Indictment as the Relative

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

**BREON PEACE** United States Attorney

/s/ Alexander A. Solomon By:

> Alexander A. Solomon Robert M. Pollack Assistant U.S. Attorneys

(718) 254-7000

Clerk of the Court (BMC) (by ECF) (without download link) cc: